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18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA

20 UNITED STATES DISTRICT COURT

21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 UNITED STATES OF AMERICA,

23 No. 2:18-CR-00172(A)-GW-1, 6, 7, 8

24 Plaintiff,

25 GOVERNMENT'S EX PARTE APPLICATION
26 FOR LEAVE TO FILE OVERSIZE BRIEF;
27 DECLARATION OF KELLYE NG

v.

28 MICHAEL LERMA, et al.,
29 [#1 MICHAEL LERMA]
30 [#6 CARLOS GONZALEZ]
31 [#7 JUAN SANCHEZ]
32 [#8 JOSE GONZALEZ]

33 Defendants.

34 Plaintiff United States of America, by and through its counsel
35 of record, the First Assistant United States Attorney for the Central
36 District of California and Assistant United States Attorneys Kellye
37 Ng, Kyle W. Kahan, and Jason A. Gorn, hereby applies ex parte for an
38 order granting the government to file an oversized brief with respect
39 to its omnibus opposition to defendants' motions for judgments of
40 acquittal and motions for new trial (Dkts. 1799, 1800, 1802, 1803,
41 1804, 1805, 1807, 1808, 1809). The government seeks to file an

1 approximately 11,420-word opposition in response to the four
2 defendants' motions, which is approximately 4,420 words longer than
3 the Local Rule's 7,000 word limit.

4 This ex parte application is based upon the attached declaration
5 of Kellye Ng.

6 Dated: November 3, 2025

Respectfully submitted,

7 BILAL A. ESSAYLI
8 First Assistant United States
9 Attorney

10 ALEXANDER B. SCHWAB
11 Assistant United States Attorney
12 Acting Chief, Criminal Division

13 /s/
14 KELLYE NG
15 KYLE W. KAHAN
16 JASON A. GORN
17 Assistant United States Attorneys

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA

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1 **DECLARATION OF KELLYE NG**

2 I, Kellye Ng, declare as follows:

3 1. I am an Assistant United States Attorney in the United
4 States Attorney's Office for the Central District of California. I
5 am the attorney representing the government in this case.

6 2. The government requests leave to file an oversized motion
7 with respect to its omnibus opposition to defendants' motions for
8 judgments of acquittal and motions for new trial ("omnibus
9 opposition"). The government seeks to file an approximately 11,420-
10 word opposition, which is approximately 4,420 words longer than the
11 Local Rule's 7,000-word limit.

12 3. After a 20-day jury trial, defendants Mike Lerma, Carlos
13 Gonzalez, Juan Sanchez, and Jose Valencia Gonzalez filed motions for
14 judgments of acquittal and motions for a new trial. (Dkts. 1799,
15 1800, 1802, 1803, 1804, 1805, 1807, 1808, 1809.)

16 4. I am aware of Local Rule 11-6.1, which limits post-trial
17 briefs at 7,000 words. I am also aware of the Court's busy docket
18 and its desire to not waste time reading unnecessarily long briefs.
19 But given the four defendants' post-trial motions, exceeding the page
20 limit for the government's omnibus opposition is practically
21 necessary for the Court to properly analyze and consider Rules 29 and
22 33.

23 5. On November 3, 2025, I emailed defendants' counsel about
24 the government's request to file an oversized brief.

25 6. For these reasons, the government respectfully requests
26 leave to file an oversized brief with respect to its omnibus
27 opposition.

1 I declare under penalty of perjury under the laws of the United
2 States of America that the foregoing is true and correct and that
3 this declaration is executed at Los Angeles, California, on November
4 3, 2025.

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7 KELLYE NG
8 Declarant
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